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May 5, 1999

Office of the Secretary
Federal Communications Commission
445 12th St., SW, Rm. TW-A325
Washington, D.C. 20554

Re: Telecommunications Relay Service Coin-Sent Paid Phone Report
CC Docket No. 90-571

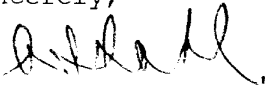
Dear Secretary:

Please consider the attached as my response to the Telecommunications Relay Service Coin-Sent Paid Report submitted by the Common Carriers, dated, December 1, 1998.

Trust that you will be sharing the attached with the Network Services Division of the Common Carriers Bureau who is reviewing the rules.

Thank you.

Sincerely,



Alfred Sonnenstrahl
Telecommunications Relay Services Consultant

Enclosures: Original report
Two copies for internal distribution

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RESPONSE

TO

TRS COIN SENT-PAID INDUSTRY TEAM ACTIVITY REPORT
CC Docket No. 90-571

by

ALFRED SONNENSTRAHL

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MAY 3, 1999

INTRODUCTION:

On July 21, 1991, the FCC issued an order, Docket CC No. 571, requiring that all telecommunications relay services (TRS) handle relay calls with all telephones, including coin sent-paid telephones by July 26, 1993.

In November of 1993, the FCC issued an order to suspend enforcement of the requirement that relay services handle coin sent-paid calls from payphones because the Common Carriers (Carriers) reported that a technological solution to handle these calls was unavailable or rather infeasible. The suspension was for two years, to expire on July 26, 1995.

During the fall of 1994, the Carriers shared with the Executive Director of Telecommunications for the Deaf, Inc. (TDI) the technical problems associated with retrofitting its networks so that TRS could handle all coin sent-paid calls. Among other things, the Carriers reported that making technical modifications to handle these calls would incur expenses upwards of at least one billion dollars (\$1,000,000,000).

During the spring of 1995, TDI initiated several meetings between the Carriers with Consumer Action Network (CAN), a coalition of national consumer organizations of, by and for deaf and hard of hearing persons. They negotiated a solution that:

- 1) Would be feasible to the Carriers; and
- 2) Would ensure consumers, especially those who could not afford to have either their own phones or credit cards, equal access to coin sent-paid phones.

Even though the Carriers and the consumers reached an interim compromise, there remained some discrepancy between the length of the suspension requested by the Carriers and consumers. The Carriers requested a five-year extension while consumers requested two years.

On August 27, 1995, the FCC suspended enforcement of the rule requiring TRS to be capable of handling coin sent-paid calls for two years until August 26, 1997. The Carriers were requested to comply with the compromise by the end of the suspension.

In November of 1995, the Carriers again met with the CAN and agreed to do the following actions during this suspension of the rule:

- 1) All local coin sent-paid calls would be free of charges;
- 2) Generic press releases/advertising describing alternatives to coin sent-paid calls were to be advertised in various newspapers and announced through various public service announcements;
- 3) Direct mailings were to be made to potential TRS users through consumer associations and local exchange carriers;
- 4) Outreach presentations and exhibits were to be held in various local, regional and national events where TRS consumers participate;
- 5) Articles were to be placed in TRS user community publications, TRS provider newsletters would be directed to TRS users, industry publications, and industry employee publications;
- 6) The Carriers would publish and distribute pamphlets describing the alternative plan, difference between calling and prepaid cards, and instructions on how to obtain and use cards; and
- 7) The Carriers would provide customer notifications in local exchange carriers' telephone directories, special TTY directories, and telephone bill inserts.

During the two-year extension of the suspension, CAN frequently provided lists of dates and respective contacts of various local, regional and national consumer-oriented events for use by the Carriers to achieve these action items. Contact names for national organization events, publications, and advertising were provided. The Carriers continuously stated that they were not ready to carry out the plan.

Yet, in its 18-Month Report to the FCC, submitted March 12, 1997, the Carriers claimed that their alternative plan was progressing satisfactorily and requested that the plan be permanently adopted.

On June 2, 1997, consumers, in a document to the FCC, disagreed with the Carriers' progress and opposed the permanent adoption of the Alternative Plan. The consumers concluded that the Carriers didn't perform their part effectively to meet the objectives of the Alternative Plan.

ORDER REQUIREMENTS:

On August 21, 1997, the FCC extended the suspension of the enforcement of the coin sent-paid rule for one more year until August 26, 1998. The Carriers, including the TRS providers, were directed to improve their efforts to educate TRS users about how they can call relay service centers from payphones using either calling or prepaid cards. The FCC also directed the Carriers to do the following within one year:

- 1) Coordinate with the consumer community to create and disseminate generic educational materials;
- 2) Distribute a consumer education letter to the public;
- 3) Attend various events to disseminate materials and have booths demonstrating how to call TRS centers from payphones; and
- 4) Cooperate with affected communities in executing information and materials in organizational publications.

ACTION:

On September 26, 1997, the Carriers asked the representatives from CAN to provide their support and resources to assist them in complying with the FCC Order. CAN requested that the Carriers administer major informational activities on a separate cooperative fund similar to the Interstate TRS Fund being compiled by the FCC-appointed administrator, the National Exchange Carriers Association. The Carriers, instead, decided to process the Order individually and without a budget.

On May 5, 1998, the Carriers met with CAN representatives. The distribution plan for a generic educational letter and wallet-sized cards was introduced. The consumers expressed concerns about limited information being shared with the public. The Carriers assured consumer representatives that they would be promoting the program aggressively, including having demonstrations in various events during Summer 1998 and have the plan posted on web sites.

Since then, reports have been received from consumers and organizations that such an educational letter was not printed in various organizational newsletters and that wallet-sized cards, if any, were left in the inconspicuous areas within TRS providers' unrelated exhibit booths. Such exhibits did not include prominent displays or hands-on opportunities for consumers. Program books of various events did not list any information or workshops about the plan.

SURVEY:

To evaluate the effectiveness of the Carriers' extremely conservative internal efforts, to date, CAN conducted a preliminary survey in Summer and Fall 1998 to measure the awareness of consumers using TRS. A short questionnaire of five basic questions with multiple choice answers was distributed to 106 participants at six conferences and expositions. (See attachment.)

The six sites were: 1) Alexander G Bell Association for the Deaf Conference, Little Rock, AR; 2) Deaf Expo '98, Ontario, CA; 3) National Convention of the Jewish Deaf Congress; 4) National Association of the Deaf Conference, San Antonio, TX; 5) Biennial National Black Deaf Advocates Conference, Indianapolis, IN; and 6) TDI Expo, Washington, DC.

The respondents were mostly well educated and their income, in general, was above average. Those who were surveyed represented approximately top 10% to 25% of the national deaf and hard of hearing population economically and academically.

The breakdown of the summary results from the survey were as follows:

44% of the respondents did not know that the payTTYs worked with the relay services.

69% did not know that the costs of TRS calls with payTTYs were waived.

85% of the respondents were under the impression that they were supposed to use cards or coins to pay TRS calls with payTTYs.

46% indicated that they had to pay for their TRS long distance calls with payTTYs.

12% paid for the long distance calls via the payphone TTYs using coins. 37% used pre-paid or calling cards, while 6% had them for free. 45% didn't know how these calls were covered.

The respondents were the residents from all over the country.

In addition, two separate groups of eight to ten deaf Hispanics, Asians and Blacks were interviewed instead of completing the questionnaire at the Deaf Expo '98 due to their inability to read English effectively. Despite their receiving free TTYs from their state distribution program, they could not afford to have telephones in their home or obtain credit or calling cards. They, who would have benefited the most from the Plan, did not know that they were able to make free local TRS calls from payTTYs.

FINDINGS & ANALYSIS:

Consumers have been tolerant of the Carriers' claims of financial hardship in complying with the FCC's Order requiring coin sent-paid telephones to be compatible with all relay services. Rather than to have the carriers pay at least one billion dollars (\$1,000,000,000) to achieve such compatibility, the consumers agreed to the Carriers' four-year old interim plan.

Since 1995, consumers have attempted to assist the Carriers by coordinating events. The Chair of the CAN and the Executive Director of the TDI frequently submitted to the Carriers lists of dates of various events so that they could promote the plan and demonstrate the use of payphones with relay services. The Carriers continuously promised that they would look into the possibility of attending such activities and have exhibit booths. To date, they have made very limited token appearances at a few of the related national conferences without making any form of presentation.

The Carriers' Industry Team report, filed with the FCC last December, indicated that the information and materials on payTTY access to TRS were provided. The Carriers, in their report, claimed that they were represented on the subject of payTTY access to TRS at over nine hundred thirty (930) events across the nation. The CAN representatives met with the Carriers and questioned the effectiveness of their activities, and recommended that such representations be documented in detail. Lists of names of individuals, type of activity, and size of the audiences should be included in the report. To date, the consumers have yet to receive such a documentation.

The Carriers' efforts to educate the public at minimal costs, if any, through web sites appear to be ineffective. Many potential users of coin sent-paid phones could not afford to have phones at home. Thus, these people without phones at home tend not to have computers and do not have access to such websites.

As the survey indicates, the Carriers' outreach activities are not achieving results adequately to meet the FCC's Order. Only 15% of the respondents in the survey were able to answer all five questions correctly.

Also, it is being inferred that should the remaining 75% to 90% deaf and hard of hearing individuals, especially those who are not participants of the conferences or members of any organization be surveyed, the results would indicate much greater need for improvements.

RECOMMENDATIONS:

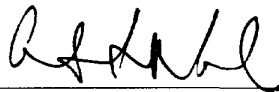
CAN proposes that the FCC review the following recommendations:

- 1) Resume the Order issued on July 26, 1991, requiring the Carriers, including TRS providers, to redesign their switch networks so that all phones, including coin payphones, are compatible with all relay services by August 27, 2001, even though the cost may be at least one billion dollars (\$1,000,000,000); or
- 2) Install at least one coin-sent paid TTY in each payphone bank that bypasses the payphone network and can be connected directly with the TRS provider(s) by August 27, 2001; or
- 3) All local and long distance TRS phone calls from any payTTY or payphone be free from charges immediately; or
- 4) The Carriers immediately provide an annual funding plan with CAN's approval that is sufficient to meet all objectives listed in the Alternative Plan as agreed to in 1995; and set a final limit for suspension no later than August 27, 2001.

Since it is evident that the Carriers have been circumventing the FCC Orders since 1995 despite the Consumers' willingness to reach a reasonable compromise to save them at least one billion dollars (\$1,000,000,000), it is strongly recommended that the FCC issue the ultimatum as described above.

Thank you.

Respectfully submitted by:



Alfred Sonnenstrahl
Consultant, Sonny Access Consulting, 1996 to present;
Chair, CAN Telecommunications Task Force, 1995 to present;
Executive Director, TDI, 1987-1996; and
Chair, Consumer Action Network, 1995-1997

Attachments: Questionnaire
 Survey Data

Distribution List

AT&T: Mike Del Casino, TRS CSP Industry Team Co-Chair
Consumer Action Network: Claude Stout, Chair
GTE: Linda Nelson, TRS CSP Industry Team Co-Chair

Telecommunications Relay Service Coin Sent-Paid Phone Survey

Introduction:

Consumer Action Network of Deaf and Hard of Hearing Americans (CAN) is conducting a survey to evaluate the public education regarding the use of public pay phone TTYs with relay services. No names are required. Your comments will be kept confidential. Your input will be very helpful in helping us improve awareness of how to use relay services through pay phone TTYs.

1. Do pay phone TTYs work with relay services?
Yes: _____ No: _____ Don't know: _____
2. Does your state relay service charge you for making local call through the pay phone TTY?
Yes: _____ No: _____ Don't know: _____
3. How do you pay for your local call through pay phone TTYs?
Coins: __ Pre-paid card: __ Calling card: __ Free: __ Don't know: __
4. Does your state relay service charge you for making long distance call through the pay phone TTY?
Yes: _____ No: _____ Don't know: _____
5. How do you pay for your long distance calls through pay phone TTYs?
Coins: __ Pre-paid card: __ Calling card: __ Free: __ Don't know: __
6. Which state do you live in? _____

TRSCSP Awareness Survey
1998-1999

	Question #	Yes	No	Coins	Cards	Free	Don't Know	% Correct
Summary (106)	1	59	11	x	x	x	36	56%
	2	28	33	x	x	x	45	31%
	3	x	x	28	20	16	42	15%
	4	49	7	x	x	x	50	46%
	5	x	x	10	39	5	52	37%

- Question 1:** Do pay TTYs work with relay services?
Question 2: Does your state relay service charge you for making local calls through pay TTY?
Question 3: How do you pay for your local calls through pay TTYs?
Question 4: Does your state relay service charge you for making long distance calls through pay TTY?
Question 5: How do you pay for long distance calls through pay TTYs?

Remarks:

- No additional charges
- Sometimes pay TTYs work with TRS
- Collect calls only
- Cant make local or long dist calls without cards
- Automatic charges for long dist calls
- Troublesome & cumbersome to get cooperation from TRS

TRSCSP Awareness Survey
1998-1999

Source	Question #	Yes	No	Coins	Cards	Free	Don't Know	% Correct
AGBAD (21)	1	11	2	x	x	x	8	52%
	2	5	9	x	x	x	7	43%
	3	x	x	4	7	5	5	24%
	4	14	0	x	x	x	7	67%
	5	x	x	1	14	1	5	67%
DEAF EXPO (20)	1	11	0	x	x	x	9	55%
	2	10	0	x	x	x	10	0%
	3	x	x	3	3	0	14	0%
	4	10	0	x	x	x	10	50%
	5	x	x	4	2	0	14	10%
JDC (10)	1	7	2	x	x	x	1	70%
	2	2	5	x	x	x	3	50%
	3	x	x	3	3	2	2	20%
	4	3	2	x	x	x	5	30%
	5	x	x	1	4	1	4	40%
NAD (13)	1	3	5	x	x	x	5	23%
	2	2	4	x	x	x	7	54%
	3	x	x	3	1	1	8	1%
	4	2	2	x	x	x	9	2%
	5	x	x	1	2	0	10	2%
NBDA (12)	1	9	0	x	x	x	3	75%
	2	3	7	x	x	x	2	58%
	3	x	x	6	2	2	2	17%
	4	8	1	x	x	x	3	67%
	5	x	x	3	7	2	0	58%
TDI EXPO (9)	1	6	1	x	x	x	2	67%
	2	3	3	x	x	x	3	33%
	3	x	x	1	1	4	3	44%
	4	5	1	x	x	x	3	55%
	5	x	x	0	2	1	6	22%
MAILINGS (21)	1	12	1	x	x	x	8	57%
	2	3	5	x	x	x	13	23%
	3	x	x	8	3	2	8	10%
	4	7	1	x	x	x	13	33%
	5	x	x	0	8	0	13	38%